



Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 98608
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NOV 02 1994

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EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR)
YM-94-087 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE
DIVISION (YMQAD) AUDIT YMP 94-09 OF SANDIA NATIONAL
LABORATORIES (SNL) (SCPB: N/A)

The YMQAD staff has evaluated the response to CAR YM-94-087.
The response has been determined to be unsatisfactory because
it does not acceptably resolve the noted conditions. The
reasons to support this determination are as follows:

1. Your response indicates that no remedial action will be taken due to time and events. This is unacceptable in that the condition identified one instance (CAR 93-36) where determination of significance was not documented on the CAR. This was identified as a correctable condition by the CAR originator during the audit. Secondly, two CARs (93-36 and 94-25) were closed without completion of verification of corrective action. SNL must either verify that all corrective action required by these CARs were implemented as stated or provide specific documented justification as to why it is not necessary to complete the verification. In all other conditions identified by the CAR, please provide justification as to specifically (discuss each CAR) why corrections to these conditions cannot be implemented. The response you provided, time and events, is not adequate justification to inhibit remedial action.
2. Your response indicates that the extent of the deficiency will be limited to fiscal year (FY) 1994. Would you please indicate why the evaluation is being limited to FY 1994 when conditions were identified in CAR YM-94-087 that were performed in FY 1993. Please provide justification for limiting the evaluation of the extent of deficiency.

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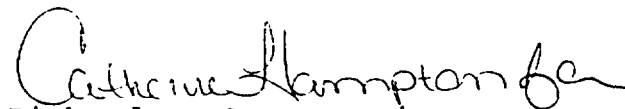
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3. Your response to root cause determination indicates the cause related to a lack of attention to detail and proper guidance. This response does not address root cause. First, the procedural requirements appear to be very explicit and interpretation is easily understood. If the individuals that performed these activities were trained in the procedures as required by the SNL Indoctrination and Training Program, the conditions in this CAR should not have occurred. Please respond to the following questions: Was the SNL Indoctrination and Training Program evaluated as to its effectiveness in assuring understanding of the SNL implementing procedures? What is the cause of lack of attention to detail? Please explain the guidance that you refer to in your response. Is this part of the Indoctrination and Training Program?
4. Your response indicates that the corrective action to prevent recurrence will include a refresher training course that will specify each aspect of the corrective action process. If all of the responsible individuals who implement the corrective action program have received indoctrination and training into the SNL corrective action procedures, why is it felt that additional training is going to effectively prevent recurrence of the noted conditions in CAR YM-94-087? Please provide the detailed rational to support this conclusion. In addition, has anyone evaluated the adequacy of the implementing procedures for corrective action to determine if clarification may be needed?

An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Deborah Sult, YMQAD/QATSS, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or Richard L. Maudlin at (702) 794-7290.



Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-516

Enclosure:
CAR YM-94-087

Les E. Shephard

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cc w/encl:

J. H. Hines, OOD, AL

~~D. G. Spradley~~, NRC, Washington, DC

S. W. Zimmerman, NWPO, Carson City, NV

R. R. Richards, SNL, Albuquerque, NM, M/S 1333

F. J. Schelling, SNL, Las Vegas, NV

M. C. Brady, SNL, Las Vegas, NV

D. G. Horton, OQA (RW-3) NV

R. M. Nelson, Jr., YMSCO, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV

D. G. Sult, YMQAD/QATSS, Las Vegas, NV

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RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

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CORRECTIVE ACTION REQUEST

1 Controlling Document QAIP 16-01, Revisions 1, 2 and 3, Corrective Action		2 Related Report No. YMP-94-09	
3 Responsible Organization SNL		4 Discussed With J. Voight/C. Jaramillo/D. Hawkinson	
5 Requirement: <p>A. Section 6.1, Step 2 states: SNL YMP QA shall determine if the deviation is a significant condition adverse to quality as defined in Subsection 3.8."</p> <p>B. Section 6.2, Step 1 states in part: "Responsible Mgt PI/TL shall...identify proposed remedial actions...." (Note: Section 3.6 indicates remedial actions are to include a determination of impact on previously completed work and an investigation into the extent of the adverse condition.)</p> <p>C. Section 6.4, Step 1 states in part: "...shall verify satisfactory completion of corrective actions and document objective evidence that was used to verify completion and effectiveness of those actions.... Verify all deviation remedial actions were completed as specified...."</p>			
6 Adverse Condition: <p>Contrary to the above, objective evidence (SNL CARs 93-23, 93-32, 93-36, 93-38, 94-11, 94-12, and 94-25) reviewed reveals that: (1) there was one case noted where determination of significance was not addressed, (2) in all but one case reviewed, remedial actions did not include a determination of impact on previously completed work and an investigation into the extent of the adverse condition, (3) in all but one instance, verifications of corrective action do not detail specific objective evidence that was used to verify completion and effectiveness of those actions, (4) in two instances CARs were closed without verification of completion of all corrective action.</p>			
9 Does a Significant Condition Adverse to Quality exist? Yes <u>X</u> No <u> </u> If Yes. Check One: <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E		10 Does a stop work condition exist? Yes <u> </u> No <u>X</u> ; If Yes - Attach copy of SWO If Yes. Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C	
13 Response Due Date: 20 Working Days From Issuance			
11 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input checked="" type="checkbox"/> Root Cause Determination			
12 Recommended Actions: <p>1. For Item 1 in Block 6, evaluate CAR 93-36 for significance and document results (remedial only).</p> <p>2. For Item 2 in Block 6, the following is recommended: A. Determine that extent of this deficiency.</p>			
7 Initiator Richard L. Maudlin <i>[Signature]</i> 09/08/94		14 Issuance Approved by: QADD <i>[Signature]</i> Date 9/12/94	
15 Response Accepted QAR _____ Date _____		16 Response Accepted QADD _____ Date _____	
17 Amended Response Accepted QAR _____ Date _____		18 Amended Response Accepted QADD _____ Date _____	
19 Corrective Actions Verified QAR _____ Date _____		20 Closure Approved by: QADD _____ Date _____	

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

13 Recommended Action(s) (continued)

- B. Identify the cause of the condition.
 - C. Determine what actions are necessary to preclude reoccurrence.
 - D. Identify the impact on quality due to not implementing this requirement.
3. For Item 3 in Block 6, the following is recommended: (see recommended actions for Item 2 above)
4. For SNL CARs 93-36 and 94-25 in Item 4 of Block 6, take the necessary action to complete verification of ALL items identified in the response to the CARs. Also, evaluate the extent of the identified condition and what actions will be taken to preclude reoccurrence.


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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

CAR YM-94-087

- A. Remedial Action: For the cited internal SNL YMP CARs, which are all closed, no specific remedial action will be taken, since the situations documented in the CARs have all been overtaken by time and events. Action to preclude recurrence, specified below, will be more significant in correcting this situation.
- B. Extent of the Deficiency: All SNL YMP CARs for FY 94 will be reviewed for evidence of the deficiencies cited in Block 6, above. (Responsible party: J. Voigt; Anticipated Completion Date: October 31, 1994)
- C. Root Cause Determination: The four cited discrepancies can be attributed to a lack of attention to detail on the part of QA personnel involved. Additionally, some of the personnel had not received enough guidance for them to be aware of the specifics that needed to be addressed.
- D. Actions to Preclude Recurrence: All QA personnel involved in CAR verification activities will receive refresher training that will specify each aspect of the corrective action process, so that these types of discrepancies will not occur in the future. (Responsible individual: J. C. Friend; Anticipated Completion Date: November 30, 1994)

for  10/12/94
L. E. Shephard
SNL YMP Technical Project Officer

10/13/94 LTR. SHEPHARD TO SPENCE

Rev 05/27/92